



# SIERRA PACIFIC INDUSTRIES

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3/18/2021

Clay Davis  
District Planner  
Feather River Ranger District  
875 Mitchell Avenue  
Oroville, CA 95965

Dear Clay,

I am writing on behalf of Sierra Pacific Industries in response to the North Complex: Berry Brush WUI Project scoping proposal released last month. Sierra Pacific Industries supports such projects aimed at post-fire restoration when such activities can be completed in a timely manner. The Proposed Action outlines the following objectives:

- Salvage cut and harvest dead and dying trees to recover some of the economic value of dead tress in order to offset the cost of restoration activities and contribute to societal needs for wood products.
- Reduce future fuel loadings.
- Increase resiliency of growing forest to future fires.
- Reduce safety hazards to people and risks to buildings, infrastructure, and cultural resources.
- Replant the site with conifer seedlings.
- Tree release and weed control.
- Maintain road improvements and road maintenance.
- Take advantage of opportunities for research to increase knowledge regarding effects on the environment from large fires.

Please consider the following comments:

Sierra Pacific Industries (SPI) supports the use of designation by damage class regarding salvage and following the making guidelines set forth in Report # RO-11-01 *Marking Guidelines for Fire-Injured Trees in California* (Smith and Cluck, 2011). Hazard Tree areas can be identified using a combination of the above guidelines and USFS Report # RO-12-01 *Hazard Tree Guidelines for Fire-Injured Trees in California* (Angwin, Cluck, et al, April 2012).

The project is entirely within the WUI's of Berry and Brush Creek communities. Tree removal is critical for public safety, fuels reduction, reforestation, and recovering some economic value. The standing burned timber will remain a safety hazard for homeowners, wood workers, FS personnel, and the public until they are addressed and removed.

Herbicide treatment will be needed to control competing vegetation for successful regeneration.

All Lands approach and Good Neighbor Policy; SPI has begun an extensive restoration effort across our ownership damaged by the North Complex/Bear Fire. We have properties that share a common boundary with National Forest ownership in this Project. SPI's long-term investment will be in jeopardy without treatments on the USFS side of the line. Treatment along the common boundary with Private-Industrial

Property needs to be one of the Objectives of the project. Please consider treatment along common boundaries with Private Residential and Private Industrial lands in your analysis.

In terms of importance relative to the 200,000 + acres burned on the Feather River District; this project ranks towards the top of the list. Berry Creek and Brush Creek communities need an aggressive, effective, and timely response from the USFS to address the imminent hazards and future fuel loading that will occur and could potentially lead to another catastrophic wildfire.

SPI supports the Forest Service's assessment that this project falls within the scope of HFRA Title I Section 605, and qualifies for authorization under a Categorical Exclusion (CE) and authorized hazardous fuels reduction project. Thank you for considering our comments.

Sincerely,



Ken Wilde  
Sierra Pacific Industries  
Lincoln Division